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*Proposed Counsel for the Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

BOWFLEX INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12364 (ABA)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED TO BE  
HEARD ON MARCH 28, 2024 AT 10:00 A.M. (ET)**

To: All Parties Receiving Electronic Notification  
via the Court's CM/ECF System

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: BowFlex Inc. (2667) and BowFlex New Jersey LLC (3679). The Debtors' service address is 17750 S.E. 6th Way, Vancouver, Washington 98683.

**PLEASE TAKE NOTICE** that the following matters are currently scheduled to be heard on **March 28, 2024 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Andrew B. Altenburg, Jr.

**PLEASE TAKE FURTHER NOTICE** that Parties wishing to attend virtually and be heard must submit a request for “Presenter Status” in advance of the hearing to Suzanne Sweeney (Suzanne\_Sweeney@njb.uscourts.gov) and provide the following information: (i) name of presenter, (ii) email address of presenter, (iii) presenter’s affiliation with the case and/or (iv) what party or interest the presenter represents. If the request is approved, the Presenter will receive appropriate Zoom credentials and further instructions via email. Parties can also attend the First Day Proceedings (for observation purposes only) by joining the Zoom webinar. The Zoom link and additional information regarding the BowFlex Inc. bankruptcy will be available on the Court’s website.

### **MATTERS GOING FORWARD**

1. *Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated Creditor Matrix and (B) File a Consolidated List of 30 Largest Unsecured Creditors, (II) Waiving the Requirement to File a List of all Equity Security Holders of BowFlex Inc. and Provide Notices Directly to Equity Security Holders, (III) Authorizing Debtors to Redact Certain Personally Identifiable Information in the Creditor Matrix and Certain Other Documents, and (IV) Granting Related Relief* [Docket No. 8]

#### **Related Documents:**

- A. *Declaration of Aina E. Konold in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order Authorizing the Debtors to (A) File a Consolidated Creditor Matrix and (B) File a Consolidated List of 30 Largest Unsecured Creditors, (II) Waiving the Requirement to File a List of all Equity Security Holders of BowFlex Inc. and Provide Notices Directly to Equity Security Holders, (III) Authorizing Debtors to Redact Certain Personally Identifiable Information in the Creditor Matrix and Certain Other Documents, and (IV) Granting Related Relief* [Docket No. 62]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

2. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Maintain Certain Insurance and Surety Coverage and to Pay All Obligations with Respect Thereto, (II) Authorizing Continuation of Premium Financing Agreements, (III) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (IV) Granting Related Relief* [Docket No. 9]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order (I) Authorizing Debtors to Maintain Certain Insurance and Surety Coverage and to Pay All Obligations with Respect Thereto, (II) Authorizing Continuation of Premium Financing Agreements, (III) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (IV) Granting Related Relief* [Docket No. 68]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, the DIP Lender, and Chubb.**

3. *Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting the Debtors' Utility Providers from Altering, Refusing, or Discontinuing Services, (II) Approving the Debtors' Proposed Adequate Assurance of Payment for Postpetition Utility Services, (III) Approving Procedures for Resolving Further Adequate Assurance Requests, and (IV) Granting Related Relief* [Docket No. 10]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order Prohibiting the Debtors' Utility Providers from Altering, Refusing, or Discontinuing Services, (II) Approving the Debtors' Proposed Adequate Assurance of Payment for Postpetition Utility Services, (III) Approving Procedures for Resolving Further Adequate Assurance Requests, and (IV) Granting Related Relief* [Docket No. 69]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

4. *Debtors' Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief* [Docket No. 12]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief* [Docket No. 70]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

5. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to Pay or Honor Certain Prepetition Trade Claims in the Ordinary Course of Business, (II) Authorizing the Debtors to Pay Claims in Respect of Outstanding Purchase Orders and (III) Granting Related Relief* [Docket No. 14]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order (I) Authorizing, But Not Directing, the Debtors to Pay or Honor Certain Prepetition Trade Claims in the Ordinary Course of Business, (II) Authorizing the Debtors to Pay Claims in Respect of Outstanding Purchase Orders and (III) Granting Related Relief* [Docket No. 71]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

6. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Maintain and Administer Prepetition Customer Programs and Practices, (II) Authorizing Debtors to Pay and Honor Related Prepetition and Postpetition Obligations, (III) Authorizing Debtors to Pay and Honor Processing Obligations, (IV) Authorizing Debtors to Utilize Electronic Means of Communication to Provide Notice to Direct Consumers and (V) Granting Related Relief* [Docket No. 20]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]

- B. *Interim Order (I) Authorizing Debtors to Maintain and Administer Prepetition Customer Programs and Practices, (II) Authorizing Debtors to Pay and Honor Related Prepetition and Postpetition Obligations, (III) Authorizing Debtors to Pay and Honor Processing Obligations, (IV) Authorizing Debtors to Utilize Electronic Means of Communication to Provide Notice to Direct Consumers and (V) Granting Related Relief* [Docket No. 72]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

7. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes & Fees, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief* [Docket No. 21]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes & Fees, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief* [Docket No. 73]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

8. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Compensation, and Benefit Obligations and (B) Continue Employee Compensation and Benefits Programs and (II) Granting Related Relief* [Docket No. 17]

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]
- B. *Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Compensation, and Benefit Obligations and (B) Continue Employee Compensation and Benefits Programs and (II) Granting Related Relief* [Docket No. 59]

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

9. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Use of Their Existing Cash Management System, Bank Accounts, Credit Card*

*Program, Merchant Services Program, Other Bank Products, Letters Of Credit, and Business Forms, (B) Continue Intercompany Transactions, and (C) Pay Related Prepetition Obligations, (II) Granting Priming Liens, (III) Modifying The Automatic Stay, (IV) Waiving Certain Investment and Deposit Guidelines, and (V) Granting Related Relief [Docket No. 34]*

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Docket No. 44]*
- B. *Interim Order (I) Authorizing the Debtors to (A) Continue Use of Their Existing Cash Management System, Bank Accounts, Credit Card Program, Merchant Services Program, Other Bank Products, Letters Of Credit, and Business Forms, (B) Continue Intercompany Transactions, and (C) Pay Related Prepetition Obligations, (II) Granting Priming Liens, (III) Modifying The Automatic Stay, (IV) Waiving Certain Investment and Deposit Guidelines, and (V) Granting Related Relief [Docket No. 60]*

**Status: This matter is going forward on an uncontested basis. The proposed revised form of order has the consent of the UCC, the U.S. Trustee, and the DIP Lender.**

- 10. *Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Post-Petition Financing and Grant Security Interests and Superpriority Administrative Expense Status Pursuant to 11 U.S.C. §§ 105, 364(c) and 364(d); (B) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362; (C) Authorizing Debtors to Enter Into Agreements with Crystal Financial LLC d/b/a SLR Credit Solutions; (D) Authorizing Debtors to Use Cash Collateral; and (E) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 [Docket No. 37]*

Related Documents:

- A. *Declaration of Aina E. Konold in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Docket No. 44]*
- B. *Declaration of Robert A. Del Genio in Support of Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Post-Petition Financing and Grant Security Interests and Superpriority Administrative Expense Status Pursuant to 11 U.S.C. §§ 105, 364(c) and 364(d); (B) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362; (C) Authorizing Debtors to Enter Into Agreements with Crystal Financial LLC d/b/a SLR Credit Solutions; (D) Authorizing Debtors to Use Cash Collateral; and (E) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 [Docket No. 39]*
- C. *Interim Order (A) Authorizing the Debtors to Obtain Post-Petition Financing and Grant Security Interests and Superpriority Administrative Expense Status*

*Pursuant to 11 U.S.C. §§ 105, 364(c) and 364(d); (B) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362; (C) Authorizing Debtors to Enter Into Agreements with Crystal Financial LLC d/b/a SLR Credit Solutions; (D) Authorizing Debtors to Use Cash Collateral; and (E) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 [Docket No. 61]*

*D. Objection of the Official Committee of Unsecured Creditors to Debtors' DIP Financing Motion [Docket No. 148]*

**Status: While the parties continue to discuss a potential resolution, this matter is going forward on a contested basis. In addition to the Committee's objection filed at Docket No. 148, the Debtors have received informal comments from other parties in interest, and language addressing such informal comments have been agreed among such parties in interest, the Debtors, the UCC, and the DIP Lender.**

Dated: March 26, 2024

/s/ Joseph J. DiPasquale

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